

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA**

The State of Missouri, *et al.*,

Plaintiffs,

v.

President Joseph R. Biden, Jr., in his official
capacity as President of the United States of
America, *et. al.*,

Defendants.

Civil Action No. 22-cv-1213

**CONSENT MOTION TO EXTEND
DEADLINE FOR COMPLETION OF EXPEDITED DISCOVERY DEPOSITIONS**

The Court on July 12, 2022 ordered that “Plaintiff States will have thirty days after the Court’s ruling” on expedited discovery depositions “to take any authorized depositions.” ECF 34 at Pt. II.C ¶ 8. The Court issued its ruling on expedited discovery depositions on October 21, 2022, ECF 90, and so, under the Court’s July 12 Order, Plaintiffs would have until November 21, 2022.

Defendants respectfully request that the Court extend, by 18 days, the deadline for completion of expedited discovery depositions, so that they would be completed by December 9, 2022, under a schedule already agreed to by the parties. Defendants have conferred with Plaintiffs, and Plaintiffs consent to this request.

The requested extension of the deadline for completion of expedited discovery depositions is warranted because it would allow the parties to conduct the depositions at issue while accommodating professional, official travel, and personal scheduling limitations of the witnesses and the parties’ counsel. The extension is needed regardless of current and anticipated litigation concerning some of the authorized depositions (including but not limited to those that are the

subject of the Defendants' mandamus petition) in light of the parties' agreed-upon schedule.

Therefore, good cause supports this motion for an extension, and it is not being made for purposes of delay. *See* Fed. R. Civ. P. 6(b)(1).

Dated: October 28, 2022

Respectfully submitted,

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